

Mr. Paul Sellmyer
Monsanto Company
15849 South U.S. Highway 231
Remington, Indiana 47977

Re: 073-15514
First Minor Permit Revision to
MSOP 073-11846-00035

Dear Mr. Sellmyer:

Monsanto Company has submitted a minor permit revision application on April 16, 2002 for the installation of the following equipment used in the hybrid corn processing operation. Pursuant to the provisions of 326 IAC 2-6.1-6 a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document:

- (a) One (1) seed corn debagger, identified as EU34 with a maximum throughput of 56,000 pounds per hour. Particulate matter emissions from this debagger is controlled by cartridge filters.

The following construction conditions are applicable to the proposed project:

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Pursuant to IC 13-15-5-3, this approval to construct becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, the minor source operating permit shall be revised by incorporating the minor permit revision into the permit as follows (Additions are **bolded** and deletions are ~~struck through~~ for emphasis):

A.2 Emission Units and Pollution Control Equipment Summary

(a) through (j) no changes

- (k) **One (1) seed corn debagger, identified as EU34 with a maximum throughput of 56,000 pounds per hour. Particulate matter emissions from this debagger is controlled by cartridge filters.**

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

- | | |
|-----|---|
| (a) | Two (2) natural gas-fired grain dryers, identified as Dry 2-A and Dry 2-B. Each dryer has four (4) burners, heat input rate of 60 million British Thermal Units (mmBtu/hr) and drying rate of 20,238 bushels per batch (Bu/batch); |
| (b) | Two (2) shellers, identified as #3 and #4, each has a capacity of 100,800 pounds per hour (lbs/hr). Particulate matter (PM) emission is controlled by four (4) cyclones, #3A, #3B, #4A, and #4B; |
| (c) | One (1) ear corn aspirator, identified as #5, with a capacity of 201, 600 lbs/hr, and is controlled by cyclone #5A; |
| (d) | One (1) Foresburg corn grain cleaner, identified as #6, with a capacity of 33,600 lbs/hr, and is controlled cyclone #6A and bagfilter #6B. Air from these control units is exhaust inside the building; |
| (e) | One (1) sizing machinery, identified as #7, with a capacity of 33,600 lbs/hr, and is controlled by cyclone #7A. The air from this cyclone is exhausted inside the building; |
| (f) | Two (2) corn grain Duo-aspirators, identified as #8 and #9 each has a capacity of 17,000 lbs/hr. Duo-aspirators #8 is controlled by cyclone #8A, and Duo-aspirator #9 is controlled by cyclone #10A; |
| (g) | Two (2) gravity tables, identified as #10 and #11, each has a capacity of 14,000 lbs/hr. These tables are controlled by cyclones #9A and #11A; |
| (h) | One (1) treating/packaging machinery, identified as #12 with a capacity of 33,000 lbs/hr; which is controlled by cyclone #12B, and bagfilter #12A. Air from these control units is exhaust inside the building; |
| (i) | One (1) rebagging unit identified as #13, which is controlled by cyclone #13; and |
| (j) | Twenty (20) storage bins, storage bins B1 through B4 has a capacity of 11,000 bushels each; storage bin B5 through B8 has a capacity of 15,000 bushels each; storage bins B9 through B12 has a capacity of 11,000 bushels each; storage bins B13 through B17 has a capacity of 4,600 bushels each; storage bin B18 has a capacity of 1,200 bushels, storage bin B19 has a capacity of 1,500 bushels; and storage bin B20 has a capacity of 250 bushels. |
| (k) | One (1) seed corn debagger, identified as EU34 with a maximum throughput of 56,000 pounds per hour. Particulate matter emissions from this debagger is controlled by cartridge filters. |

Emission Limitations and Standards

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the PM emission limit from the corn processing facilities shall not exceed the following:

Facility/ Operation	Process Weight Rate (ton/hr)	PM Allowable Emissions (lb/hr)
New Seed Corn Debagger	28.0	38.2
Ear Corn Dryer #2A	8.25	16.8
Ear Corn Dryer #2B	8.25	16.8
Shelling	16.5	26.8
Grain Aspirator #5	16.5	26.8
Grain Cleaning	16.5	26.8
Duo-Aspirator #8	8.25	16.8
Duo-Aspirator #9	8.25	16.8
Gravity Table #10	7.0	15.0
Gravity Table #11	7.0	15.0
Corn Sizing	16.5	26.8
Rebagging	16.5	26.8

The pounds per hour limitation shall be calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and

D.1.4 Particulate Matter (PM)

The cyclones and bagfilters shall be in operation at all times whenever the process (**seed corn debagging**, corn drying, shelling, aspirator, cleaning and corn sizing), each control device is controlling, is in operation in order to comply with the limit in D.1.1.

D.1.5 Visible Emissions Notations

- Daily visible emission notations of the **seed corn debagger exhaust 34A**; sheller's #3 and #4 stack exhausts, cyc-3A, cyc-3B, cyc-4A, cyc-4B; aspirator #5 stack exhaust, cyc-5A; Duo aspirators #8 and #9 stacks exhausts; cyc-8A, cyc-10A; gravity table stacks exhausts, cyc-9A, cyc-11A; and rebagging stack exhaust, cyc-13 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not

counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the **seed corn debagger exhaust 34A**; sheller's #3 and #4 stack exhausts, cyc-3A, cyc-3B, cyc-4A, cyc-4B; aspirator #5 stack exhaust, cyc-5A; Duo aspirators #8 and #9 stacks exhausts, cyc-8A, cyc-10A; gravity table stacks exhausts, cyc-9A, cyc-11A; and rebagging stack exhaust, cyc-13.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this permit revision which includes this letter, the attached operating conditions applicable to these emission units, and revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman at OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

APD

cc: File - Jasper County
U.S. EPA, Region V
Jasper County Health Department
Air Compliance Section Inspector - Wanda Stanfield
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Monsanto Company
15849 South U.S. Highway 231
Remington, Indiana 47977**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 073-11846-00035	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: May 23, 2000
First Notice-Only Change No.: 073-12878, issued on December 18, 2000	
First Minor Permit Revision No.: 073-15514	Pages Affected: 5, 16, 17, 19
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: April 30, 2002

- (h) One (1) treating/packaging machinery, identified as #12 with a capacity of 33,000 lbs/hr; which is controlled by cyclone #12B, and bagfilter #12A. Air from these control units is exhaust inside the building;
- (i) One (1) rebagging unit identified as #13, which is controlled by cyclone #13; and
- (j) Twenty (20) storage bins, storage bins B1 through B4 has a capacity of 11,000 bushels each; storage bin B5 through B8 has a capacity of 15,000 bushels each; storage bins B9 through B12 has a capacity of 11,000 bushels each; storage bins B13 through B17 has a capacity of 4,600 bushels each; storage bin B18 has a capacity of 1,200 bushels, storage bin B19 has a capacity of 1,500 bushels; and storage bin B20 has a capacity of 250 bushels.
- (k) One (1) seed corn debagger, identified as EU34 with a maximum throughput of 56,000 pounds per hour. Particulate matter emissions from this debagger is controlled by cartridge filters.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is not required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is **not** a major source, as defined in 326 IAC 2-7-1(22);

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

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- (c) One (1) ear corn aspirator, identified as #5, with a capacity of 201, 600 lbs/hr, and is controlled by cyclone #5A;
- (d) One (1) Foresburg corn grain cleaner, identified as #6, with a capacity of 33,600 lbs/hr, and is controlled cyclone #6A and bagfilter #6B. Air from these control units is exhaust inside the building;
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- (g) Two (2) gravity tables, identified as #10 and #11, each has a capacity of 14,000 lbs/hr. These tables are controlled by cyclones #9A and #11A;
- (h) One (1) treating/packaging machinery, identified as #12 with a capacity of 33,000 lbs/hr; which is controlled by cyclone #12B, and bagfilter #12A. Air from these control units is exhaust inside the building;
- (i) One (1) rebagging unit identified as #13, which is controlled by cyclone #13; and
- (j) Twenty (20) storage bins, storage bins B1 through B4 has a capacity of 11,000 bushels each; storage bin B5 through B8 has a capacity of 15,000 bushels each; storage bins B9 through B12 has a capacity of 11,000 bushels each; storage bins B13 through B17 has a capacity of 4,600 bushels each; storage bin B18 has a capacity of 1,200 bushels, storage bin B19 has a capacity of 1,500 bushels; and storage bin B20 has a capacity of 250 bushels.
- (k) One (1) seed corn debagger, identified as EU34 with a maximum throughput of 56,000 pounds per hour. Particulate matter emissions from this debagger is controlled by cartridge filters.

Emission Limitations and Standards

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the PM emission limit from the corn processing facilities shall not exceed the following:

Facility/ Operation	Process Weight Rate (ton/hr)	PM Allowable Emissions (lb/hr)
New Seed Corn Debagger	28.0	38.2
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Duo-Aspirator #9	8.25	16.8
Gravity Table #10	7.0	15.0
Gravity Table #11	7.0	15.0
Corn Sizing	16.5	26.8
Rebagging	16.5	26.8

The pounds per hour limitation shall be calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for these emissions units and their respective control devices.

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test these emission units by this permit. However, IDEM may require compliance testing when necessary to determine if these emission units are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Particulate Matter (PM)

The cyclones and bagfilters shall be in operation at all times whenever the process (seed corn debagging, corn drying, shelling, aspirator, cleaning and corn sizing), each control device is controlling, is in operation in order to comply with the limit in D.1.1.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the seed corn debagger exhaust 34A; sheller's #3 and #4 stack exhausts, cyc-3A, cyc-3B, cyc-4A, cyc-4B; aspirator #5 stack exhaust, cyc-5A; Duo aspirators #8 and #9 stacks exhausts; cyc-8A, cyc-10A; gravity table stacks exhausts, cyc-9A, cyc-11A; and rebagging stack exhaust, cyc-13 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the seed corn debagger exhaust 34A; sheller's #3 and #4 stack exhausts, cyc-3A, cyc-3B, cyc-4A, cyc-4B; aspirator #5 stack exhaust, cyc-5A; Duo aspirators #8 and #9 stacks exhausts, cyc-8A, cyc-10A; gravity table stacks exhausts, cyc-9A, cyc-11A; and rebagging stack exhaust, cyc-13.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor MSOP Revision

Source Background and Description

Source Name:	Monsanto Company
Source Location:	15849 South U.S. Highway 231
County:	Jasper
SIC Code:	0723
Minor Source Operation Permit No.:	073-11846-00035
Operation Permit Issuance Date:	May 23, 2000
Minor Permit Revision No.:	073-15514
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a permit revision application from Monsanto Company relating to the installation of the following equipment used in the hybrid corn processing operation.

- (a) One (1) seed corn debagger, identified as EU34 with a maximum throughput of 56,000 pounds per hour. Particulate matter emissions from this debagger is controlled by cartridge filters.

History

On April 16, 2002, Monsanto Company submitted an application to the OAQ requesting to add one debagger to their existing plant. Monsanto Company was issued a Minor Source Operating permit on May 23, 2000.

Existing Approvals

The source was issued a Minor Source Operating Permit (MSOP073-11846-00035) on May 23, 2000. The source has since received the following:

- (a) First Notice-Only Change No.: 073-12878, issued on December 18, 2000

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
34A	Debagger	10.3	1.13	3550	70

Recommendation

The staff recommends to the Commissioner that the Minor Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 16, 2002

Emission Calculations

- (a) Seed Corn Debagger:
Maximum Throughput = 56,000 lbs/hr. Using AP-42 Chapter 9 Section 9.1, May 1998
Emission Factor, PM = 0.061 lb/ton
PM10 = 0.034 lb/ton. The Debagger is controlled by Cartridge Filters.

$$\begin{aligned}\text{Uncontrolled PM Emissions} &= 56,000 \text{ lbs/hr} * \text{ton}/2000 \text{ lb} * 0.061 \text{ lb/ton} * \\ &= \text{ton}/2000 \text{ lb} * 8760 \text{ hr/yr} \\ &= 7.5 \text{ tons/yr}\end{aligned}$$

$$\begin{aligned}\text{Controlled PM Emissions} &= 7.5 \text{ tons/yr} * (1-0.99) \\ &= 0.075 \text{ ton/yr}\end{aligned}$$

$$\begin{aligned}\text{Uncontrolled PM10 Emissions} &= 56,000 \text{ lbs/hr} * \text{ton}/2000 \text{ lb} * 0.034 \text{ lb/ton} * \\ &= \text{ton}/2000 \text{ lb} * 8760 \text{ hr/yr} \\ &= 4.2 \text{ tons/yr}\end{aligned}$$

$$\begin{aligned}\text{Controlled PM10 Emissions} &= 4.2 \text{ tons/yr} (1-0.99) \\ &= 0.042 \text{ ton/yr}\end{aligned}$$

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	7.5
PM-10	4.2
SO ₂	0.0
VOC	0.0
CO	0.0
NO _x	0.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Justification for the Approval Level

The proposed Seed Corn Debagger is subject to 326 IAC 2-6.1-6(g)(4), Minor Permit Revisions which states "modification that would have a potential to emit less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year of either particulate matter (PM) or

particulate matter less than ten microns (PM10)".

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Seed Corn Debagger	0.075	0.042	0.0	0.0	0.0	0.0	0.0
Modification Total Emissions	0.075	0.042	0.0	0.0	0.0	0.0	0.0
PSD Threshold Levels	250	250	250	250	250	250	-

Existing Source PTE	22.48	9.42	0.4	2.8	44.2	52.6	-
Source PTE After Issuance of the Modification	22.56	9.46	0.4	2.8	44.2	52.6	-

County Attainment Status

The source is located in Jasper County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	not determined

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Jasper County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) New Source Performance Standards

- (1) 40 CFR Part 60.300, Subpart DD -Standards of Performance for Grain Elevators.

This NSPS applies to grain terminal elevators with a permanent storage capacity of 2.5 million U.S. bushels, except those located at animal food manufacturers, breweries, and live-stock feedlots. It is also applicable to grain storage elevators located at any wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean extraction plant which has a permanent grain storage capacity of 1 million bushels.

In the Minor Source Operating Permit 073-11846-00035, issued on May 23, 2000 Monsanto Company has been determined to be not subject to this NSPS, because it is not a wheat flour mill, a wet corn mill, a dry corn mill, nor a soybean oil extraction plant and does not have a storage capacity of 1 million bushels.

- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs)
There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

- (a) 326 IAC 2-6 (Emission Reporting)

This source has already been determined in the original MSOP that it is not subject to 326 IAC 2-6 (Emission Reporting), because it has no potential to emit more (100) tons per year of PM10, CO, VOC, NOx, or SO2.

- (b) 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (1) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

- (a) 326 IAC 6-3-2 (Process Operations)

This rule mandates a PM emission limit for the Seed Corn Debagger using the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10 \left(\frac{56,000 \text{ lb/hr}}{2000} \right)^{0.67} \\ = 38.2 \text{ lb/hr}$$

Conclusion

The operation of this new Seed Corn Debagger shall be subject to the conditions of the attached Minor **Permit Revision No. 073-15514-00035**.